

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**In Re: HOSPITALITY HOLDING OF MISSISSIPPI, LLC,  
Debtor**

**Case No. 24-50387-KMS  
Chapter 11**

**REUNION CAPITAL LLC'S RESPONSE TO MOTION WITHDRAW AS COUNSEL**

Reunion Capital LLC ("Reunion") responds to Motion to Withdraw as Counsel [Dkt. 80] as follows:

1. Reunion is a creditor in this proceeding as is more fully set forth in its Motion to Terminate Stay and for Other Relief [Dkt. 41]. Reunion's claim is secured by a parcel of real estate with improvements situated at 2688 Beach Blvd., Biloxi, MS.
2. The hearing on Reunion's Motion to Terminate Stay and for Other Relief is set for August 1, 2024, at 1:30 pm.
3. Shortly before Debtor's counsel filed his Motion to Withdraw as Counsel, Reunion and its undersigned counsel learned that, at its regularly scheduled meeting on July 2, 2024, the Biloxi City Council voted to move forward with plans to demolish the improvements on the subject property in order to abate unsanitary and unsafe conditions which the Debtor has allowed to develop and worsen.
4. Reunion will suffer extreme prejudice and loss if there is any delay in this case arising from the Motion to Withdraw as Counsel.
5. Reunion respectfully urges the Court, if it grants counsel's Motion to Withdraw, to require the Debtor to retain substitute counsel in time to proceed with the previously scheduled hearing on August 1.

**WHEREFORE**, Reunion Capital LLC respectfully request that the Court deny the Motion to Withdraw as Counsel or condition the withdrawal in such a way that the Motion to Terminate Stay and for Other Relief is heard and determined on August 1, 2024. Reunion prays for other appropriate relief.

**DATED** this the 3rd day of July, 2024.

Respectfully submitted,  
**REUNION CAPITAL, LLC**

By: /s/ J. Mark Franklin, III  
J. Mark Franklin, III  
Its attorneys

**CERTIFICATE OF SERVICE**

I, J. Mark Franklin, III, hereby certify that on this day copies of the foregoing documents were served upon the following:

Hospitality Holding of Mississippi, LLC  
Attn: Farrah Asgari-Majd, Manager  
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by United States mail, postage prepaid, or by electronic notice on July 3, 2024.

/s/ J. Mark Franklin, III  
J. Mark Franklin, III

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